

## MEMORANDUM:

Re: Preliminary Assessment Cupples Products, St. Louis, Missouri

From: S.K. 9-6-85  
Steven Kinser

To : Gale Wright

This site was originally listed to induce a follow-up inspection to verify the reduction in RCRA status from TSD facility to that of a generator only. The inspection revealed no evidence of past or present disposal of hazardous waste.

I concur with the author that no further action is necessary at this site.

*Gale A. Wright*  
Agree 9/9/85

Disagree

Comments

State should submit a Final Disposition Form.

SUPERFUND

SEP 10 1985

SITE LOG

✓

Alice  
674P

ABANDONED/UNCONTROLLED HAZARDOUS WASTE SITE INVESTIGATION

"3012" Summary  
Case # 534.702

Cupples Products  
Division of H. H. Robertson Company  
2650 South Hanley Road  
St. Louis, Missouri 63144

I. INVESTIGATOR: Kerwin C. Singleton  
Environmental Specialist  
Waste Management Unit  
Missouri Department of Natural Resources  
St. Louis Regional Office

FEB 11 1985

II. DATE INVESTIGATION INITIATED: January 30, 1985

DATE INVESTIGATION COMPLETED: February 4, 1985

III. BACKGROUND OF THE INVESTIGATION:

Ms. Alice Fuerst of U. S. EPA - Region VII informed this investigator that Cupples Products originally registered as a TSD facility, but later reduced their status to generator only. The ERRIS listing of the company was intended to induce a follow-up inspection to verify this reduction in status.

IV. IDENTITY OF PERSONS INTERVIEWED FOR THIS REPORT:

Mr. Larry Garner & Mr. James Schwartz  
Chief Chemist & Manager, Technical Services  
Cupples Products Division  
2650 South Hanley Road  
St. Louis, Missouri 63144  
(314) 781-6729

V. BRIEF SUMMARY OF INFORMATION OBTAINED:

The investigation revealed no evidence of past on-site disposal activities.

VI. DETAILED ACCOUNT OF THE INVESTIGATION:

After making the acquaintance of Mr. Garner, Chief Chemist, I explained the nature of the investigation to him. We were later joined by Mr. James Schwartz, Manager of Technical Services.

Cupples Products began operations at the South Hanley location about 1943. The site was previously occupied by AMP Company, which manufactured electrical products during World War II. It was subsequently purchased by Cupples Products/Wallace Pencil, which began the fabrication of aluminum building products (mainly aluminum windows).

SUPERFUND

MAR 5 1985

SITE LOG

Messrs. Garner and Schwartz stated that to the best of their knowledge, there has never been any on-site disposal; their waste has always been hauled off-site. At the present, spent solvents are collected by Clayton Chemical Company for reclamation, while other hazardous wastes are handled by TWI. Cupples has had extensive dealings with the EPA, according to Mr. Schwartz. This includes a 3007 letter sent to Cupples on March 6, 1984, concerning past disposal activities prior to submittal of the Notification of Hazardous Waste Activity required under RCRA.

A tour of the company's premises revealed no evidence of past or current on-site waste disposal activities.

The site is located at the intersection of South Hanley Road and Manchester Road in Maplewood, Missouri.

VII. CONCLUSION AND RECOMMENDATION:

This investigation revealed no sign of on-site disposal; no further action is warranted by this Department.

VIII. ATTACHMENTS:

Site Locator Map  
3007 Letter from EPA Region VII and Cupples' Response  
EPA Form 2070-12

IX. SIGNATURES:

PREPARED BY:

Kerwin C. Singleton  
Kerwin C. Singleton

Environmental Specialist  
Waste Management Unit  
Missouri Department of Natural Resources  
St. Louis Regional Office

6 February, 1985  
Date

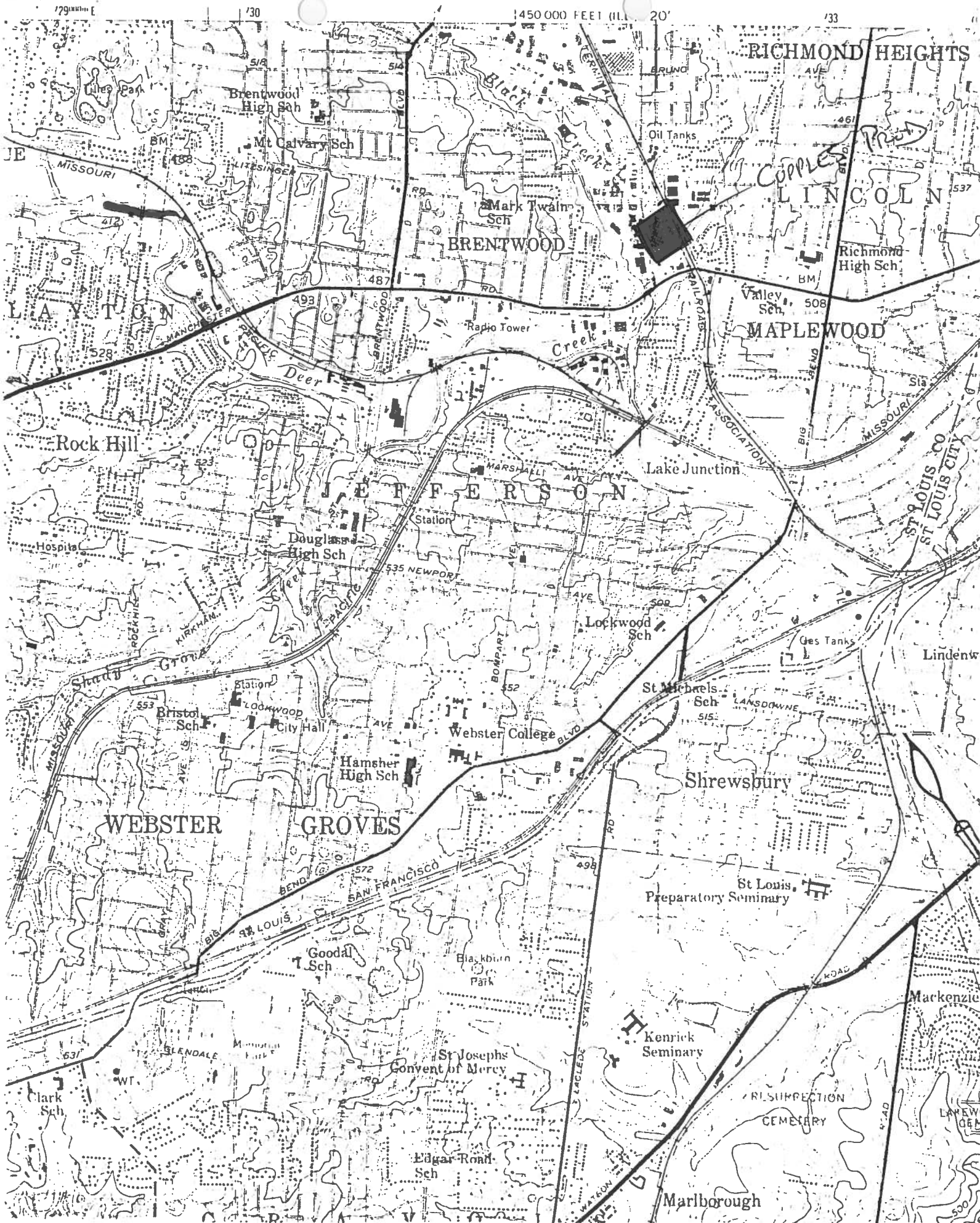
APPROVED BY:

F. Donald Maddox  
F. Donald Maddox

Regional Administrator  
Missouri Department of Natural Resources  
St. Louis Regional Office

February 6, 1985  
Date

FDM/KCS/mc





POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER  
MO D046370318

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)

CUPPLES PRODUCTS DIVISION

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER

2650 SOUTH HANLEY RD

03 CITY

ST LOUIS

04 STATE

05 ZIP CODE

06 COUNTY

MO

63144

ST LOUIS

07 COUNTY CODE

510

08 CONG DIST

2

09 COORDINATES LATITUDE

38° 36' 55"

LONGITUDE

90° 20' 00"

10 DIRECTIONS TO SITE (Starting from nearest public road)

III. RESPONSIBLE PARTIES

01 OWNER (if known)

H. H. ROBERTSON COMPANY

02 STREET (Business, mailing, residential)

TWO GATEWAY CENTER

03 CITY

PITTSBURGH

04 STATE

05 ZIP CODE

06 TELEPHONE NUMBER

PA

15222

( )

07 OPERATOR (if known and different from owner)

08 STREET (Business, mailing, residential)

09 CITY

10 STATE

11 ZIP CODE

12 TELEPHONE NUMBER

( )

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE ☐ B. FEDERAL:

(Agency name)

☐ C. STATE

☐ D. COUNTY

☐ E. MUNICIPAL

☐ F. OTHER:

(Specify)

☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3001 DATE RECEIVED:

MONTH DAY YEAR

☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c)

DATE RECEIVED:

MONTH DAY YEAR

☒ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES

DATE

1/31/85

☐ NO

BY (Check all that apply)

☐ A. EPA

☐ B. EPA CONTRACTOR

☒ C. STATE

☐ D. OTHER CONTRACTOR

☐ E. LOCAL HEALTH OFFICIAL

☐ F. OTHER:

(Specify)

CONTRACTOR NAME(S):

02 SITE STATUS (Check one)

☒ A. ACTIVE

☐ B. INACTIVE

☐ C. UNKNOWN

03 YEARS OF OPERATION

6. 1943

1 PRESENT

☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

NONE PERTAINING TO THIS INVESTIGATION

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

NONE

FEB 11 1985

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)

☐ A. HIGH

(Inspection required promptly)

☐ B. MEDIUM

(Inspection required)

☐ C. LOW

(Inspect on time available basis)

☒ D. NONE

(No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT

LARRY GARNER  
JAMES SCHWARTZ

02 OF (Agency Organization)

CUPPLES PRODUCTS DIV

03 TELEPHONE NUMBER

1314 781-6729

04 PERSON RESPONSIBLE FOR ASSESSMENT

KERWIN C SINGLETON

05 AGENCY

DEQ

06 ORGANIZATION

MDNR-SLRD

07 TELEPHONE NUMBER

1314 849-1313

08 DATE

MONTH DAY YEAR

SUPERFUND

MARCH  
FEB

5 1985

SITE LOG





# Potential Hazardous Waste Site

## Preliminary Assessment

CUPPLES PRODUCTS DIVISION  
2650 SOUTH HANLEY RD  
ST. LOUIS, MO 63144  
MR. LARRY GARNER  
CHIEF CHEMIST  
MR. JAMES <sup>TH</sup>SCHWARTZ  
MANAGER, TECHNICAL SERVICES

RECEIVED

FEB 11 1985

MAIL ROOM

**RECORD OF  
COMMUNICATION**

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE  
☐ OTHER (SPECIFY)

(Record of item checked above)

TO:

Kerwin Singleton

FROM:

Alice Fuent

DATE

12-17-84

TIME

SUBJECT

Cupples Products

SUMMARY OF COMMUNICATION

Transmitted to Kerwin Singleton  
MDNR - S+LWS

1. letter to James Schwartz from Morris Kay  
3-6-84, re: 3007 request
2. letter to John Engu from Larry Garner  
4-2-84, re: 3007 response
3. TCR to John Engu from Larry Garner  
3-26-84 re: 3007 response

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES

TO:



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

MO 0046370318

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA  
04 NARRATIVE DESCRIPTION (Include name(s) of species)

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES  
(Spills/runoff/standing liquids/leaking drums)

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

01 ☐ N. DAMAGE TO OFFSITE PROPERTY  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

IV. COMMENTS

V. SOURCES OF INFORMATION (Cite specific references, e. g., state files, sample analysis, reports)



69

**RECORD OF  
COMMUNICATION**

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE

☒ OTHER (SPECIFY)

(Record of item checked above)

TO:

Joe Rowe

FROM:

Alice Furst

DATE

TIME

SUBJECT

SUMMARY OF COMMUNICATION

Transmitted copy of File to  
MDNR on 10-25-84

Cupples Products  
MOD046370318

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES

TO:

# Cupples Products

DIVISION OF H H ROBERTSON COMPANY  
2650 SOUTH HANLEY ROAD  
ST LOUIS, MISSOURI 63144  
314 781-6729

MOD046370318

RECEIVED

APR 04 1984

SUPERFUND SECTION

April 2, 1984

United States Environmental Protection Agency  
Region VII  
324 East Eleventh Street  
Kansas City, Missouri. 64106

Attn: Mr. John Enger

In response to Morris Kay's letter dated March 6, 1984, to the best of my knowledge Cupples Products Division has never disposed, either intentionally or accidentally, any wastes on the premises on on areas adjacent to the grounds of its installation.

If any further information is required for Morris Kay's letter, please contact Mr. James Schwartz, Manager - Technical Services.

Best regards,



Larry Garner  
Chief Chemist  
Technical Services

LG:sks

cc: Mr. J. Schwartz  
Mr. H. Richter



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER  
MO 0046370318

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

01 ☐ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 AREA POTENTIALLY AFFECTED: \_\_\_\_\_ (Acres) 04 NARRATIVE DESCRIPTION

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 WORKERS POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

FEB 11 1985

MAR 6 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

FEB 11 1985

Mr. James Schwartz  
Manager Technical Services  
Cupples Products Division  
2650 South Hanley Road  
St. Louis, Missouri 63144

Dear Mr. Schwartz:

The Environmental Protection Agency (EPA), Region VII office, Superfund Section is requesting from various waste generators within the Region VII zone, information concerning possible on-site disposal of generated or any acquired wastes.

If Cupples Products Division has disposed, either intentionally or accidentally, of any wastes on the premises of or areas adjacent to the grounds of its installation, please notify us in the manner set forth below. This request concerns all on-site wastes disposal activities which have taken place before or after your submittal of the Notification of Hazardous Waste Activity, EPA Form 8700-12. This request is made according to the authority of Section 3007 of the Resource Conservation and Recovery Act of 1976, 42 U.S.C. 6927, as amended, and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9604.

Specifically, the following information is requested:

1. The person to contact in your company regarding this request, including name, title, address, and telephone number.
2. With respect to all wastes disposed of at this site:
  - a) The amounts, chemical composition, and physical characteristics of each of these wastes;
  - b) The time period or periods over which each of these wastes was disposed;
  - c) The quantity (weight or volume) of each of these wastes so disposed;
  - d) The nature and condition of any containers in which these wastes were placed prior to disposal;
  - e) The results of any sample analyses performed on these wastes prior to disposal.

ARWM:WMBR:SPFD:JENGER:db:x6864:2/24/84:Disk 16-11

SPFD  
ENGER

SPFD  
FURST

SPFD  
BIGGS

WMBR  
MORBY

ARWM  
SPRATLIN

ARWM  
WAGNER

RGAD  
KAY

*Enger*

*Furster*

*Biggs*

*Morby*  
2/29/84

*Wagner*

*Kay*  
3/16

3. Copies of any contracts, invoices, receipts, or other documents related to Cupples Products Division's disposal of wastes at its installation.

This request extends to all information contained in written documents in the possession of Cupples Products Division, its officers, employees, consultants, or agents, as well as any other information whether written or otherwise, within the knowledge of the Cupples Products Division including its current and former officers, employees, consultants, or agents. For your convenience, you may provide copies of existing written documents. In addition, please furnish us with all additional information which you may be able to provide based upon the knowledge or recollection of Cupples Products Division current and former officers, employees, consultants, or agents.

Cupples Products Division may, if it desires, assert a business confidentiality claim covering part or all of the information submitted. Such a claim may be made by placing or (or attaching to) the information, at the time of its submittal to EPA, a cover sheet, stamped or printed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by EPA. If confidential treatment is sought only until a certain date or until the occurrence of a certain event, the request should so state.

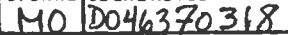
Information submitted for which a claim of confidentiality is made will be disclosed by EPA only to the extent and by the means authorized by the procedures specified in 40 C.F.R. Part 2, Subpart B (41 FR 36902, September 1, 1976, as amended at 43 FR 40003, September 8, 1978). If no such claim is made when information is provided to EPA, the information may be made available to the public without further notice. Applicable regulations are found in 40 C.F.R. Part 2, Subpart B, referenced above.

You are requested to submit the information requested in this letter to the member of my staff assigned to this matter, John Enger, within 20 working days of receipt of this letter. The failure of Cupples Products Division to provide the information requested may result in civil or criminal liability pursuant to Section 3008 of the Resource Conservation and Recovery Act. If you have any questions regarding this request, contact Mr. Enger at (816) 374-6864. Your cooperation is appreciated.

Sincerely yours,

Morris Kay  
Regional Administrator

cc: Stan Jorgensen, MDNR



<input type="checkbox"/> A. TOXIC	<input type="checkbox"/> E SOLUBLE	<input type="checkbox"/> I HIGHLY VOLATILE
<input type="checkbox"/> B. CORROSIVE	<input type="checkbox"/> F INFECTIOUS	<input type="checkbox"/> J EXPLOSIVE
<input type="checkbox"/> C. RADIOACTIVE	<input type="checkbox"/> G FLAMMABLE	<input type="checkbox"/> K REACTIVE
<input type="checkbox"/> D PERSISTENT	<input type="checkbox"/> H IGNITABLE	<input type="checkbox"/> L INCOMPATIBLE
		<input type="checkbox"/> M NOT APPLICABLE

# Cupples Products

RECEIVED  
APR 0 1984

DIVISION OF H. H. ROBERTSON COMPANY  
2650 SOUTH HANLEY ROAD  
ST. LOUIS, MISSOURI 63144  
314 781-6729

SUPERFUND SECTION

April 2, 1984

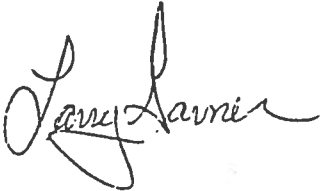
United States Environmental Protection Agency  
Region VII  
324 East Eleventh Street  
Kansas City, Missouri. 64106

Attn: Mr. John Enger

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If any further information is required for Morris Kay's letter, please contact Mr. James Schwartz, Manager - Technical Services.

Best regards,



Larry Garner  
Chief Chemist  
Technical Services

LG:sks

cc: Mr. J. Schwartz  
Mr. H. Richter

FEB 11 1985



# CONVERSATION RECORD

TIME

DATE

3:20

3/26/84

TYPE

☐ VISIT

☐ CONFERENCE

☒ TELEPHONE

☒ INCOMING

☐ OUTGOING

ROUTING

NAME/SYMBOL

INT

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

ORGANIZATION (Office, dept., bureau, etc.)

TELEPHONE NO.

Mr. Larry Garner  
Cupples Products Div.

John Eger  
SPFA

SUBJECT

Response to 3007 letter

SUMMARY

Mr. Garner called for Mr. Schwartz inquiring what information, in particular, we requested in 3007 letter sent 3/6/84. I informed him we were mainly concerned if they had disposed of any waste on-site. If they did not, I requested a list of transporters who did haul the waste, past and present.

I informed <sup>him</sup> the response was due this week (Tuesday, 3/27, I thought). I extended his time to reply until the beginning of next week (Monday or Tuesday, 4/2 or 3). Confusing call. He had no particular questions. Seemed overwhelmed by 3007 letter.

ACTION REQUIRED

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

DATE

ACTION TAKEN

Extended response deadline to beginning of next week (4/2 or 3).

SIGNATURE

TITLE

DATE